

Date: 04 August 2021

Reviewers: Dr. Matt Becker

Organization/Code: University of Hawaii, 007698208

Project Title: Draft Groundwater Flow and Velocity Evaluation, Red Hill Bulk Fuel Storage Facility, JBP HH, Oahu, Hawaii, July 2021

No.	Page	Section	Comment	Action
1.	5	4.1, Line 17	which measurements are likely to demonstrate preferential flow? Temperature, conductivity?	
2.	5	4.2, Line 27	Give our discussions, I think hydrophysical logging might take the place of borehole dilution. We will get better velocity numbers from the colloidal borescope so it will be more useful, I think, to get relative inflow rates. Velocity can be obtained also from hydrophysical loggings so nothing is lost by making the substitution.	
3.	7	5.2, Line 22	If we substitute hydrophysical logging, then we would need a model to interpret. RAS has their own software, and we can request Tsang and Doughty's Bore II code: https://www.osti.gov/biblio/1232365-bore-ii	
4.	8	5.3, Line 9	I'm not sure what you mean here. If we properly scale shouldn't we get the correct local flows?	

Date: 09 August 2021
Reviewers: Nicole Palazzolo
Organization/Code: EPA Region 9
Project Title: Draft Groundwater Flow and Velocity Evaluation, Red Hill Bulk Fuel Storage Facility, JBPHH, Oahu, Hawaii, July 2021

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1.	1	1, Line 13	Despite the CSM being an important document, it is not a AOC deliverable. I would suggested making this clear in the last sentence of this paragraph.	
2.	5	4.2, Line 26	Consider providing an explanation for why these specific wells selected?	
3.	6	4.3, Line 19	Consider providing an explanation for why these specific wells selected?	
4.	8	6, Line 11	Consider adding the proposed field implementation schedule and data sharing/reporting schedules here. Also, can you please provide additional details about schedule as proposed during TWG Meeting #42? Is there a way to streamline some of the activities so we can get results quicker?	
Worksheet #1: Project Quality Objectives (PQO)/Systematic Planning 1 Process Statements				
1.	1.5	2, Line 28	[",,then the Agencies...."]: Suggested revision - "The data generated by this study may provide an additional line of evidence for model and CSM validation."	

Date: 05 August 2021
Reviewers: Matt Tonkin
Organization/Code: S.S. Papadopoulos & Associates, Inc. (EPA SME)
Project Title: Draft Groundwater Flow and Velocity Evaluation, Red Hill Bulk Fuel Storage Facility, JBPHH, Oahu, Hawaii, July 2021

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<i>General: Note that Bob Whittier has a lot more detail he has gone into, at the level of an SOP/SAP, but below I am just focusing on getting the purpose/objectives locked down.</i>				
1.	1 and 3	1 and 3	<p>Based on our discussions over the last 24 months, I believe that the core purpose of the study is to obtain information on the local scale directions and rates of groundwater flow, as inferred from measurements made within individual boreholes using “intra-well” as opposed to “inter-well” techniques. Intra-well studies will be conducted at different vertical placements within the open-screened interval of each tested well to determine whether there is variation in these quantities at each well location. To the extent practical, I understand that intra-well studies will be conducted both with Red Hill Shaft (RHS) pumping, and not pumping, to identify whether there are measurable differences in these quantities between pumping and non-pumping conditions (this is stated in Section 4 at various locations but should be indicated up-front in the purpose/objectives). Once results from the intra-well studies have been obtained, these can then be combined via inter-well comparisons to infer the variability in directions and rates of groundwater flow, and whether any consistent (systematic) patterns of variability – such as trends – are present or whether the inter-well variability appears to be unsystematic and essentially random. Information obtained from the intra-well studies and inter-well comparisons will be used</p>	

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			to corroborate or update and refine the local (RHBSF-focused) conceptual site model (CSM). Subsequently, if necessary and appropriate, these data and the updated CSM will be used to update and potentially re-calibrate one or more of the numerical groundwater flow models.	
2.	3	3.2	This is an important statement: "Since in-well testing provides information at a localized scale, it may not be directly comparable on a well-by-well basis to the information presented in the CSM and GWFM reports." We will need to look to Dr. Becker for his guidance on how information from intra-well studies is upscaled or otherwise compared to larger-scale modeling and mapping studies. It would be good to add additional information to this statement regarding the suite of potential, common, methods for accomplishing this.	
3.	4	4	Following from the call on 8/3, I do wonder whether slug testing or a similar method makes sense to undertake. No, its not absolute nor as reliable on a large scale, but it can definitely provide information on relative transmissivities between wells. Since the individual borescope/other tests will be similar in some sense (they don't directly measure velocities in the aquifer materials, but give a sense of direction and relative velocities) I think the slug tests fall into the same category of information – good relative measures comparable between wells, but for absolutes on the scale of RHS/RHBSF we will need to rely on methods like the TFN work already completed. Obtaining these measurements contemporaneously and as	

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			<p>part of the same field program as the in-well borescope etc. testing would be a nice way to provide a tidy package.</p> <p>(*Note: I don't recall if slug testing was previously performed in the wells – I seem to recall it may have been in a subset, but not in all. Note also that pneumatic tests can be used if a sizeable mechanical slug cannot easily be inserted in the well. And finally, Wilson et al (1997) provide a little info on slug testing compared with simple bail-down tests, and their relative values).</p>	
Worksheet #1: Project Quality Objectives (PQO)/Systematic Planning 1 Process Statements				
<i>General: Overall this is a good start and outline. There are some uses of terms (based on my experience which is dominantly under CERCLA) that it would be good to clear up.</i>				
1.	1	1.1	<p>- is Worksheet #1 going to be an Addendum to the main Work Plan? Because I am not sure the first sentence in Section 1.1 is entirely accurate, it seems copied from the main Work Plan. This Worksheet should be introduced as the document addressing the specific PQOs/SPPS of the planned Study.</p>	
2.	1	1.2	<p>– the term principal study question (PSQ) is first introduced here and is the terminology I am more familiar with (PSQ and DQOs, versus PQO and SPPS, although I am very familiar with the systematic planning process). I think it would be good to define for purposes of this study the overlap and the differences between PQO and DQO since both terms are used. As I understand it, DQOs can often dig down into specifics of acceptability of data for intended uses, etc., whereas PQOs are often used at a slightly higher level to define what data will be collected, for what purposes, and who will be the recipients</p>	

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			and users of the data. In this sense, as I understand it, PQOs can be less restrictive on the "quality" and end-uses of the data, as long as the data are gathered as planned, and processed, and distributed as intended to the end users. In this sense, PQO may be the best term / approach for this study - but a definition from the navy perspective for this study would be helpful.	
3.	1	1.3	<p>– may consider adding slug testing/pump-down testing to this, as noted above in comments on the main Work Plan.</p> <p>This section is open on the quality of the information and the quality control procedures. I believe this would be the "meat" of the DQOs (as opposed to PQOs, noted above). Quality control protocols are good; and I would emphasize the manufacturer criteria for the equipment used, and that any explicit dos/donts therein are followed, but not define quantitative/%margin/acceptability criteria or get too quantitative/prescriptive on the DQOs, because of the difficult setting and what is an exploratory study. I have seen %margin acceptability criteria defined before field studies that upended the work. We don't have explicit thresholds in play here such as standards (although there may be PQLs at play, see Section 1.6).</p>	
4.	2	1.4	– recommend adding a simple figure defining the horizontal extents, so that everyone visualizes the area this study is focused on (essentially, an envelop around the traditional wells)	
5.	2	1.5	– this is always the rub. What is "consistent" and what is "differ substantially". To get started, we need an earlier section or statement that	

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			<p>defines what the CSM and GWFM reports “present”, so we know what we are comparing to and can have an understanding of what “differ” means. For example (and this is just a first cut):</p> <ul style="list-style-type: none"> • <i>“Although the various GFWMs constructed by the Navy demonstrate some differences in groundwater flow patterns, the CSM and GWFM collectively depict fairly uniform groundwater flow conditions beneath the RHBSF, with the direction of flow being predominantly makau-to-makai under simulated hydraulic gradients that are on the order of one foot in 500 feet (0.002).”</i> 	
6.	3	1.6	<p>– please see comments on Section 1.3. In addition, though this is not a “lab” study, do the manufacturers have published PQLs for their instrumentation, so we have lower-bounds on what is measurable and meaningful. Documenting these can be very important when dealing with Section 1.5 and what is consistent or inconsistent.</p>	
7.	3	1.7	<p>- may consider adding slug testing/pump-down testing to this, as noted above in comments on the main Work Plan</p>	

Date: 04 August 2021
Reviewers: Bob Whittier / Gerry Beckett
Organization/Code: Hawaii Department of Health (DOH) / AQUI-Ver, Inc. (DOH SME)
Project Title: Draft Groundwater Flow and Velocity Evaluation, Red Hill Bulk Fuel Storage Facility, JBPHH, Oahu, Hawaii, July 2021

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1.	1	1, Line 14	As important, the testing is intended to add insight into the hydrogeologic conditions and likely controls of contaminant fate and transport at appropriate scales of interest, as well as uncertainties therein.	
2.	1	1, Line 23	Add, per above, better understanding of CF&T considerations, uncertainties, and the applicability of EPM assumptions	
3.	1	1, Line 23	RBW: The vertical profiles will also indicate if there is vertical stratification. This knowledge could be useful in targeting sample depths. RHMW05 is a well where this may be an issue	
4.	3	3, Line 9	<p>RBW: I think it would be appropriate to rephrase to "To address uncertainties about the groundwater flow trajectory and velocities; and the utility of using the Red Hill Shaft to contain a spill...."</p> <p>As it is written I interpret the statement to mean "the Navy is doing these test because the regulators are forcing us to". That is not the case, the Navy is doing these tests because there are large number of questions and uncertainties that the regulators have pointed out that have not been adequately addressed.</p>	
5.	4	3.2, Line 7	<p>Those key conclusions/interpretations include: (they are not findings, which implies a direct data element):</p> <ul style="list-style-type: none"> - Relatively rapid g.w. flow - Mauka - makai general direction - Down-dip flow preference - Clinkers are the controlling hydraulic zones <p>etc.</p>	

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6.	4	3.3, Line 9	RBW: I would change the Testing Objectives to say "Gain increased understanding of the groundwater flow trajectory and velocity, and the utility of using the Red Hill Shaft to contain a spill."	
7.	5	4.1, Line 10	RBW: I would change "after" to "during". As stated, it appears unclear what the status of the RHS pumps are during the testing.	
8.	5	4.2, Line 28	RBW: I Would add either RHMW09 or RHMW10; chemistry and drawdown response indicate these are potentially in a different flow zone. This suite of test can inform on the hydraulic relationship between RHMW09, RHMW10, and RHMW19; and the rest of the wells at Red Hill.	
9.	6	4.2, Line 18	and inspect for non-ideal or heterogeneous flow responses.	
10.	6	4.3, Line 29	Substitute or add at least one well on the SE side of the ridge.	
11.	7	4.3, Line 2	or dye tracer depending on the equipment, vendor and processing methods to be determined	
12.	7	4.3, Line 4	RBW: Again, change "pumped" to "pumping" to remove any ambiguity about the RHS during the test.	
13.	7	5.2, Line 23	RBW: Collins and Bianchi, 2020, give Python based program for analyzing BH dilution tests.	
14.	7	5.2, Line 28	Sensitivity to the well flow perturbation adjustment factor (alpha) and variance in interpreted results	